MCAQ Office Use Only
Public Comment received? _____
Date: _____
Initials:_____

Mecklenburg County Air Quality

PERMIT APPLICATION REVIEW SUMMARY

Title V

Section A: FACILITY INFORMATION		Existing	x	New	
Company Name (Legal Corporate Name)	Industrial Container Services – NC, LLC				
Site Name (If Different From Above)	Industrial Container Services – NC, LLC (Charlotte)				
Site Address (Street, City, Zip Code)	2900 West Trade Street, Charlotte, NC 28208				
General Description of Business	A drum reconditioning facility				
Facility AQ Classification(s)	Title V	**Site Consistent w/ Zoning? (Y/N)**	Y		

Section B: APPLICATION INFORMATION		Modified	x	New	
Date of Application	5/18/2020	**Application Tracking Number**		2020-AQ-52361	
Date Complete Application Received	6/4/2020	**AQC Date/Public Comment Opens**		Newspaper & Website Notice, also at 1/25/2021 AQC	
Confidentiality Requested?	No	**AQC Agenda Type:** Notice, Alternate, FYI		Alternate	
Application Results: Brief description of actions requested by application and/or taken by MCAQ.		5-year renewal of Title V Permit			
Permit Issued as a Result of Application – Number:		21-01V-225			
Permit Voided as a Result of Application – Number:		16-01V-225			

Section C: REGULATORY INFORMATION						
MCAPCO Regulations Applicable: List only specific conditions and/or regulations cited in permit issued. Indicate subpart for regulations 2.0524, 2.1110 & 2.1111.	2.0515- Particulates from Miscellaneous Industrial Processes 2.0516- Sulfur Dioxide Emissions from Combustion Sources 2.0541 - Control of Emissions from Abrasive Blasting 2.0958- Work Practices For Sources of Volatile Compounds 2.0967- Miscellaneous Metal and Plastic Parts Coating 2.1111- Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products 2.0535- Excess Emissions Reporting and Malfunctions					
Miscellaneous Applicability (Y/N)	**N**	**112r (40CFR68)**	**N**	**Strat. Ozone (40CFR82)**	**Y**	**CAM (40CFR64)**
HAPs >10tpy, Potential Emissions: facility-wide	glycol ethers					
TAPs Modeled: this application	None					

Section D: FACILITY- WIDE EMISSIONS INFORMATION					
AIR POLLUTANTS	**Calculated Actual Emissions With Control (tons/year)**				
	Existing	**New**	**Total**	**# Change + / (-)**	**% Change + / (-)**
Particulate Matter < 10 microns - PM-10	2.8	0	2.8	0	0
Particulate Matter < 2.5 microns – PM2.5	2.8	0	2.8	0	0
Sulfur Dioxide - SO_2	0.01	0	0.01	0	0
Nitrogen Oxides - NO_x	1.6	0	1.6	0	0
Carbon Monoxide - CO	1.3	0	1.3	0	0
Volatile Organic Compounds - VOC	19.1	0	19.1	0	0
All Hazardous Air Pollutants - HAPs	1.5	0	1.5	0	0

AQ Specialist Signature: Evan Shaw **Date Completed:** 12/21/2020

Supervisor Signature: Jason Rayfield **Date Approved:** 01/12/2021

SECTION A DETAILS

FACILITY INFORMATION

Detailed discussion of any items in Section A. At a minimum provide the following information:
1. Basis for permit: reason facility/source is "major" under Title V and submitting a Title V application
2. description of business operation (more detailed than summary page)

Basis for Permit:

- Major source for particulate matter (PM_{10} and $PM_{2.5}$) and volatile organic compounds (VOC) (>100 tpy PTE)
- Major source for hazardous air pollutants HAPs [>25 tpy PTE combined HAPs and >10 tpy PTE individual HAP (glycol ethers)]
- Minor source for nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur dioxide (SO_2) (<100 tpy PTE)
- This application is for the 5-year renewal of the Title V permit
- ICS-Charlotte was issued an initial Title V permit on September 25, 2001

Business Operation:

ICS-Charlotte operates a metal container reconditioning facility located at 2900 West Trade Street in Charlotte, North Carolina and includes the following processes:

- One (1) drum reclamation furnace with integral afterburner for cleaning drum interiors;
- Four (4) shot blasters controlled by two baghouses for removal of paint from drum exteriors; and,
- Three (3) miscellaneous metal parts coating lines [one (1) exterior drum coating booth and bake oven, one (1) interior drum coating booth and bake oven, and one (1) drum lid coating booth] and one (1) drum ring dip coating station.

A detailed description of each process is described as follows:

Drum Furnace Operations

After unloading and sorting, drums, lids and rings are processed through the Drum Reclamation Furnace. This is the first stage of their drum reconditioning process. The drums are processed at a temperature sufficient to completely dry and loosen exterior and interior paint, as well as any drum residue, for ease of removal by the shot blast system.

Shot Blasting Operations

After drums, plugs, lids and rings are processed in the Drum Reclamation Furnace, they are shot-blasted to remove residue and paint. There are four separate shot blast units with exhaust routed to two dust collectors.

Metal Working Operations

After drums, plugs, lids and rings are shot-blasted, they undergo several steps to ensure proper condition as a shipping container. Drums go through an expander to remove dents and a chime sealer. Lids go through a straightener. These processes do not involve cutting, sanding or abrading metal, nor do they involve any chemical usage. No air emissions are generated by these processes. To maintain proper operation of metal working equipment, various lubricating oils containing organic compounds may be used.

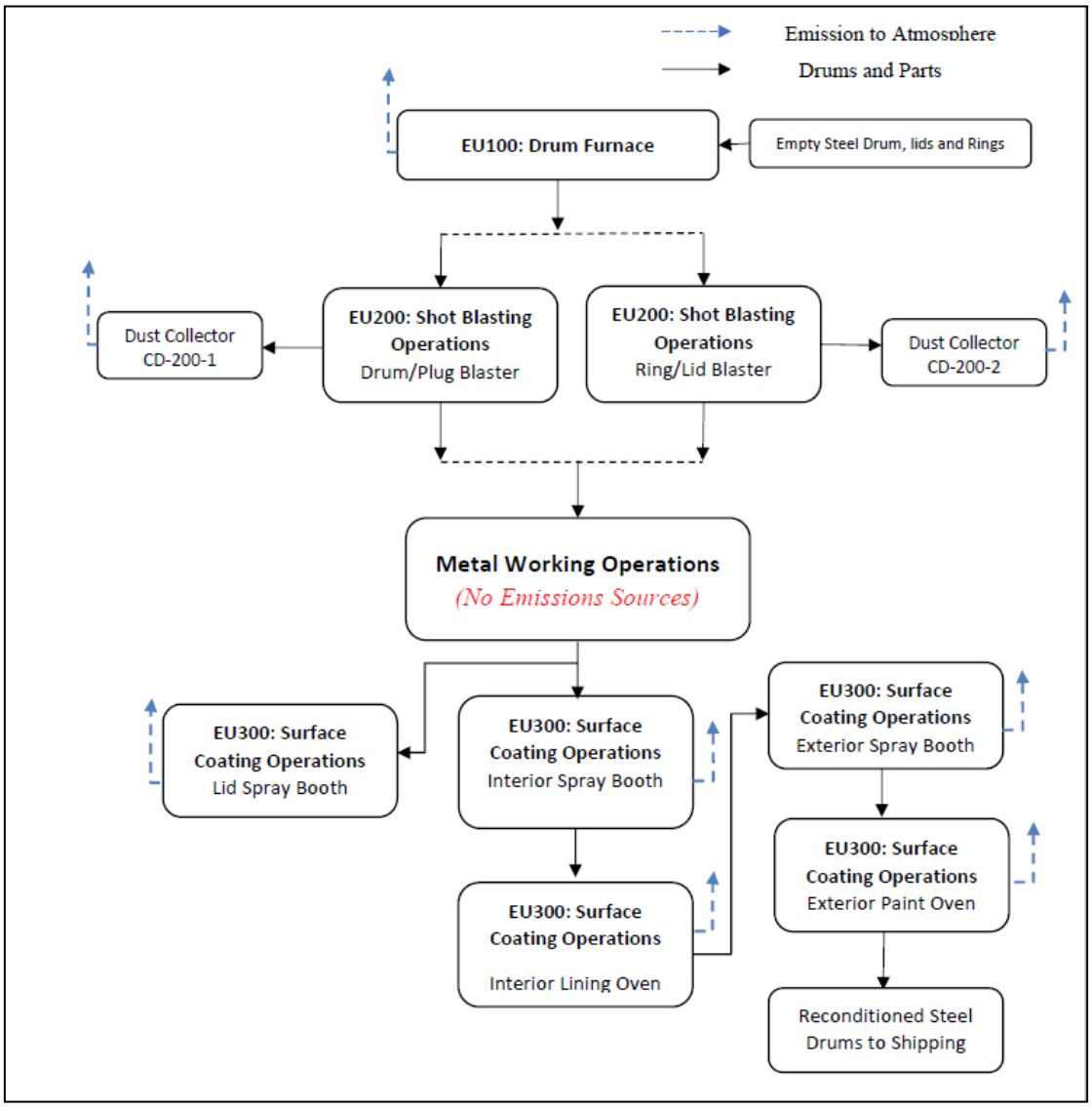
Surface Coating Operations

After metal-working processes are complete, drums, lids and rings are painted according to customer specification. Surface Coating Operations include application of both interior linings and exterior coatings to drums and lids. Three separate paint booths are used, along with two bake ovens fired by natural gas. There is also a ring dip tank for coating drum rings where each ring is dipped into an open container filled with coating. After coating, the rings are placed on racks and air dried.

Miscellaneous Operations
There are various activities including cleanup and miscellaneous cleaning performed both inside and outside of the spray booths. These activities may result in evaporative fugitive emissions of VOC and HAPs.

Insignificant Operations
Activities exempt because of category, or size and production, which include the diesel storage tank, drum expander, chime sealer, lid straightener, etc.

A process diagram included in the application is as follows:



SECTION B DETAILS

APPLICATION INFORMATION

[List all emission sources (permitted and exempt) reviewed as a result of this application, their associated control devices and pollutants. Provide a detailed discussion of any other items in Section B at bottom under "Application Notes"]

EMISSION SOURCE ID	EMISSION SOURCE DESCRIPTION 1. Type, manufacturer, capacity 2. Control device with ID (if any)		POLLUTANTS EMITTED	MISCELLANEOUS NOTES	Previous Permit No. (If applicable)
EU-100	Drum Furnace Operation	One 18 million Btu/hr drum reclamation furnace (primary chamber) fueled by natural gas or No. 2 fuel oil with a modified afterburner (secondary chamber)	PM, PM_{10} & $PM_{2.5}$, NOx, SO_2, CO, VOC, HAP	No changes to equipment.	16-01V-225
EU-200	Shot Blasting Operation	Drum Shot Blast Unit Plug Shot Blast Unit Controlled by CD-200-1 Baghouse (Torit)	PM, PM_{10} & $PM_{2.5}$	No changes to equipment.	16-01V-225
		Ring Shot Blast Unit Lid Shot Blast Unit Controlled by CD-200-2 Baghouse (Wheelabrator)			
EU-300	Surface Coating Operation	Interior lining drum spray booth	PM, PM_{10} & $PM_{2.5}$, NOx, SO_2, CO, VOC, HAPs	No changes to equipment.	16-01V-225
		Interior lining cure oven (natural gas)			
		Exterior drum coating spray booth			
		Exterior coating cure oven (natural gas)			
		Interior/Exterior lid coating spray booth			
		Ring Dip tank			
EU-400	Facility-wide Fugitives	~~Spray contact cement application~~	VOC, HAPs	Remove spray contact cement application, booth coat application, and odor masking compounds application.	16-01V-225
		~~Booth coat application~~			
		~~Odor masking compound application~~			
		Miscellaneous cleaning operations			
Facility-wide Insignificant Activities		Maintenance lubricating oil &	VOC	Remove leak tester – sodium nitrate usage	16-01V-225

	grease usage			
	Drum expander, chime sealer & lid straightener			
	3,000 gallon diesel fuel tank			
	~~Leak tester – sodium nitrate usage~~			
	Air leak tester			

Note: In accordance with MCAPCO 1.5508(x), regulated fugitive emissions (from any of the 27 categories) as defined in 40 CFR 70.2 or for HAP emission purposes, shall be included in the same manner as stack emissions. All regulated fugitive emission sources may be grouped and listed as one (1) emission source under Emission Source ID No.

APPLICATION NOTES

There are no changes to major source pollutant applicability, emissions, permitted equipment, or compliance assurance monitoring with this Title V permit renewal application.

The facility will be classified as a major source for PM_{10}, $PM_{2.5}$, VOC, and HAPs; and as a minor source for NO_X, CO, and SO_2. Because there is no change in emissions, a TAP review is not triggered.

Administrative changes made to Permit

1. **Add HAPs to coating notification requirement**

   Add a coating notification requirement regarding the HAP standard to which the facility is subject (MACT Subpart MMMM) in addition to the coating notification already listed in the permit for VOC:

POLLUTANT/ PARAMETER	NOTIFICATION REQUIREMENT	SUBMITTAL DATES
VOCs regulated under MCAPCO 2.0900	For each new coating or solvent, calculations that demonstrate compliance with the applicable VOC standard (pounds VOC/gallon coating)	20 days prior to initial use
HAPs regulated under MCAPCO 2.1111 (MACT Subpart MMMM)	For each new coating or solvent, calculations that demonstrate compliance with the applicable HAP standard (pounds HAP/gallon coating solids)	

2. **Equipment removal from permit**

   Remove the below equipment from the emission source table in accordance with written request from the facility. The spray contact cement application process, booth coat application process, odor masking compound operation, and sodium nitrate usage in leak testing has all been removed from the facility, and the facility has no intention of replacing the equipment.

Fugitives EU-400	Spray contact cement application
	Booth coat application
	Odor masking compound application

Insignificant Activities ES-IA	Leak tester – sodium nitrate usage

Regulatory Review for MACT, RACT, Toxics Avoidance, and CAM

1. 40 CFR 63 Subpart 4M – Surface Coating of Miscellaneous Metal Parts and Products

§63.3882 What parts of my plant does this subpart cover?
The coating operation, storage containers and mixing vessels for coatings, equipment for conveying coatings.

§63.3890 What emission limits must I meet?
(b)(1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

§63.3891 What are my options for meeting the emission limits?
(a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890…

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis…

The facility complies via the "Emission rate without add-on controls" option. Rolling 12-month emission rates are used on a monthly basis to demonstrate compliance with a HAP limitation of 2.6 lbs OHAP per gallon coating solids. The facility also demonstrates compliance with the compliant material option with all of their current coatings, but should an individual coating be greater than the 2.6 lb OHAP/gal coating solids, they could still show compliance with their rolling 12-month emission rates via the emission rate without add-on controls option.

§63.3920 What reports must I submit?
(a) Semiannual compliance reports. (1)(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

2. MCAPCO 2.0967 – Miscellaneous Metal and Plastic Parts Coatings

Coating Limits:
For interior coating:
4.2 lb VOC/gal coating; and,
For exterior coating:
3.5 lb VOC/gal coating

The VOC content for interior and exterior coatings is listed in the facility's materials spreadsheet included in the application. The facility is required to provide MCAQ with the calculations detailing the VOC content measured for each new coating. MCAPCO Regulation 2.0967(f) allows the use of manufacturer specifications/documentation to determine VOC content instead of Method 24.

3. MCAPCO 1.5104 – General Duties and Powers of the Director, with the Approval of the Board

The drum furnace operation (EU-100) is limited to the values listed below to avoid toxics. If ICS-Charlotte wishes to change any of these limits they will have to demonstrate compliance with all applicable regulations (i.e., toxics).

ICS-Charlotte is limited to following operating conditions:

- An average daily limit of ≤ 200 drums/hr; and
- Minimum secondary chamber (afterburner) temperature of 1600˚F (continuously).

The limit of ≤ 200 drums/hr was previously accepted by the facility to avoid toxics; it was not based on stack test data. The facility has requested emission limit increases in past renewal applications, but then ultimately withdrew the requests because the facility did not want to trigger modeling.

No request to increase daily drum limits were requested with this renewal application.

4. 40 CFR 64 Compliance Assurance Monitoring

The Torit Baghouse (CD-200-1) is the only emission unit at the facility subject to the requirements of 40 CFR 64. The Torit baghouse is subject to CAM based on the following:

1. Source is subject to the following standard: MCAPCO Regulation 2.0541 (opacity standards);
2. A control device (i.e., baghouse) is used to control particulate emissions; and
3. The source has an uncontrolled potential of greater than 100 tpy PM (PTE PM = 272.66 tpy) based on inlet concentration from 2006 stack test. Note: due to configuration of the inlet ductwork during the 2010 test, it was not possible to meet Method 1 requirements for sampling point location. MCAQ determined that inlet sampling would not be necessary for future tests as it is not required for compliance with the facility's permit.

Although only CD-200-1 is subject to CAM, ICS-Charlotte submitted a CAM plan August 23, 2006 for both of its baghouses.

The facility will continue monitoring the pressure drop on a weekly basis as established in the 2006 CAM plan.

ICS-Charlotte will also conduct daily visual emission observations once per shift for each baghouse. Any addressing actions shall be recorded.

Note: The Wheelabrator baghouse (CD-200-2) is not subject to CAM because uncontrolled potential emissions are less than 100 tpy.

SECTION C DETAILS

REGULATORY INFORMATION

(Identify the MCAPCO Regulations reviewed because of this application. At minimum, the regulations already listed should be reviewed and a reason given for applicability or non-applicability. If a Regulation has a standard, list the standard and indicate how the source is in compliance.)

MCAPCO REGULATION NUMBER/TITLE	EMISSION SOURCE ID No(s). SUBJECT	NOTES ON REGULATION (compliance demonstration, applicability, etc.)
1.5500 Title V Provisions	All	The facility is classified as a major source as PM_{10}, $PM_{2.5}$, and VOC potential emissions are above the 100 tpy Title V permitting threshold and individual HAP (glycol ethers) and combined HAP potential emissions are above the 10 tpy and 25 tpy thresholds, respectively. Only sources that are subject to PSD for another pollutant are required to address GHGs under PSD review and Title V permitting.
1.5700 Toxic Air Pollutant Procedures	NA	The facility did not trigger a toxics review with this renewal.

2.1110 NESHAP (40 CFR 61)	NA	None of the emission sources at the facility emit any HAP that is regulated under a Part 61 NESHAP.
2.1111 NESHAP (40 CFR 63) (MACT)	EU-300	*40 CFR 63, Subpart MMMM –"NESHAP for Surface Coating of Miscellaneous Metal Parts and Products"* <u>Applicability</u> ▪ ICS-Charlotte is classified as a major source; ▪ ICS-Charlotte is classified as major for HAP; and ▪ ICS-Charlotte uses more than 250 gallons/year of coatings that contain HAPs <u>Compliance Date</u> ▪ ICS-Charlotte submitted the Initial Notification of Compliance Status for compliance on March 4, 2008. <u>Emission Limit</u> ▪ 63.3890 (b)(1) states in part –"for an existing affected source, you must limit organic HAP emissions to the atmosphere from…each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period." <u>Options for Meeting Emission Limit</u> ▪ Compliant Material Option ▪ Emission Rate without add-on control options *ICS-Charlotte has identified this as the option in which they will use to demonstrate compliance with this regulation (compliance will need to be demonstrated on monthly basis – for a rolling 12 month period).* ▪ Emission Rate with add-on controls option The facility submits semi-annual compliance reports to demonstrate compliance with HAP emission limit. The report tracks the rolling 12-month average.
2.0524 New Source Performance Standards	NA	*40 CFR 60, Subpart SS – "Standard of Performance for Industrial Surface Coating: Large Appliances"* ICS-Charlotte surface coating of metal drums and lids does not fall under the definition of large appliance parts *(i.e., metal lid, door, casing, panel or other interior/ exterior metal part or accessory that is assembled to form a large appliance product)* or large appliance products *(i.e., metal range, oven, microwave oven, refrigerator, freezer, washer, dryer, dishwater, water heater, or trash compactor manufactured for household, commercial or recreational use)* therefore ICS-Charlotte is **<u>not</u>** subject to this standard.
2.0530 Prevention of Significant Deterioration	NA	Note: Mecklenburg County is currently an attainment or maintenance area for all PSD pollutants. The facility is classified as a minor source for PSD purposes.

<table>
<tr><td>2.0544 Prevention of Significant Deterioration for Greenhouse Gases</td><td>NA</td><td>Based on the June 23, 2014 U.S. Supreme Court ruling, GHG emissions alone cannot trigger a PSD review. Sources already subject to PSD for other pollutant(s) are required to review GHGs under PSD. (see above)</td></tr>
<tr><td>2.2100 Risk Management Program (40 CFR 68)</td><td>NA</td><td>The facility is not subject to 40 CFR 68 – “Prevention of Accidental Releases” – Section 112(r) as indicated on the A-1 form submitted in the application.</td></tr>
<tr><td>2.2600 Source Testing</td><td>NA</td><td>Stack testing is not required as a result of <u>this</u> permit action.

The facility is no longer be required to conduct stack testing as part of the TV renewal. See discussion in CAM section below.</td></tr>
<tr><td>40 CFR 82: Stratospheric Ozone Protection</td><td>NA</td><td>The facility does not use compounds regulated under 40 CFR 82.</td></tr>
<tr><td>40 CFR 64 Compliance Assurance Monitoring</td><td>EU-200</td><td>The Torit Baghouse (CD-200-1) is the only emission unit at the facility subject to the requirements of 40 CFR 64. The Torit baghouse is subject to CAM based on the following:
1. Source is subject to the following standard: MCAPCO Regulation 2.0541 (opacity standards);
2. A control device (i.e., baghouse) is used to control particulate emissions; and
3. The source has an uncontrolled potential of greater than 100 tpy PM (PTE PM = 272.66 tpy) based on inlet concentration from 2006 stack test. Note: due to configuration of the inlet ductwork during the 2010 test, it was not possible to meet Method 1 requirements for sampling point location. MCAQ determined that inlet sampling would not be necessary for future tests as it is not required for compliance with the facility’s permit.

Although only CD-200-1 is subject to CAM, ICS-Charlotte submitted a CAM plan August 23, 2006 for both of its baghouses.

The facility will continue monitoring the pressure drop on a weekly basis as established in the 2006 CAM plan.

ICS-Charlotte will also conduct daily visual emission observations once per shift for each baghouse. Any addressing actions shall be recorded.

Note: The Wheelabrator baghouse (CD-200-2) is not subject to CAM because uncontrolled potential emissions are less than 100 tpy.</td></tr>
<tr><td>2.0515 Particulates from Miscellaneous Industrial Processes</td><td>EU-100</td><td>Particulate matter “shall not exceed the level calculated with the equation:”
$E = 4.10(P)^{0.67}$
ICS has demonstrated compliance with this regulation as follows:

<table><tr><th></th><th>Process Rate, P</th><th>Allowable, E</th><th>Emission Rate</th></tr></table></td></tr>
</table>

		<table><tr><th></th><th>(tons/hr)</th><th>(lbs/hr)</th><th>(lbs/hr)</th></tr><tr><td>**EU-100**</td><td>4.00</td><td>10.34</td><td>2.70</td></tr></table> Note: An empty 55-gallon drum weighs approx. 40lbs. The facility is limited to 200 drums/hr therefore, the process rate would roughly be 4 tons/hr. 4 tons/hr results in an allowable emission rate of 10.34 lbs/hr. The emission rate for EU-100, 2.70 lbs/hr, was obtained from the 2006 stack test. Based on the 2006 stack test, the facility is expected to be in compliance with 2.0515.
2.0541 Control of Emissions from Abrasive Blasting	EU-200	The facility's shot blasting operations are conducted indoors and are controlled by two baghouses. The facility is expected to comply with the requirements of MCAPCO Regulation 1.5107 – "Control and Prohibition of Visible Emissions" as specified in MCAPCO Regulation 2.0541.
2.0516 Sulfur Dioxide Emissions from Combustion Sources	EU-100, EU-300	Sulfur dioxide shall not exceed 2.3 lbs SO_2/MMBtu input. The cure ovens (EU-300) operate only on natural gas and the AP42 emission factor for natural gas combustion is 0.001 lbs/MMBtu, therefore will not exceed the 2.3 lbs/MMBtu standard burning natural gas. The drum furnace (EU-100) has the potential to burn #2 fuel oil. Assuming 0.5% max sulfur content, the emission factor for SO2 when burning No. 2 fuel oil is 0.51 lbs/MMBtu, which is also below the standard.
2.0958 Work Practices for Sources of Volatile Organic Compounds	EU-300, EU-400, EU-IA	ICS-Charlotte is required to comply with the requirements as outlined in the regulation. All VOC containing materials shall be stored in containers with lids, spills shall be cleaned up as soon as possible, and solvents used in cleaning shall be stored in closed containers. Compliance will be verified through annual air quality inspections.
2.0967 Miscellaneous Metal and Plastic Parts Coatings	EU-300	ICS is required to comply with the reasonably available control technology (RACT) requirements at all times. ICS-Charlotte must submit product information (prior to use) for MCAQ to determine compliance. <u>Coating Limits</u>: For interior coating: 4.2 lb VOC/gal coating; and, For exterior coating: 3.5 lb VOC/gal coating The coating calculations to date have shown the facility to be in compliance with this regulation. Continued compliance is expected.
2.0535 Excess Emissions Reporting and Malfunctions	EU-200, (CD-200-1, CD-200-2)	The Shot Blast Operation with associated baghouses is subject to the regulation and ICS-Charlotte will be required to operate emission sources and control equipment concurrently. Exceedances lasting longer than four hours must be reported to MCAQ within 24 hours.

1.5104 General Duties and Powers of the Director, with the Approval of the Board	EU-100	ICS-Charlotte is limited to the values listed below to avoid toxics. If ICS-Charlotte wishes to change any of these limits they will have to demonstrate compliance with all applicable regulations (i.e., toxics). ICS-Charlotte is limited to following operating conditions: ▪ An average daily limit of ≤ 200 drums/hr; and ▪ Minimum secondary chamber (afterburner) temperature of 1600˚F (continuously).

SECTION D DETAILS

EMISSION INFORMATION

CALCULATION METHOD CODES (List all that apply)	**1= Stack test result 2= Material (mass) balance 3= EPA approved information (AP-42, CTG, etc.) 4= Other (specify in Table below)**
CALCULATION REJECTION CODES (List all that apply)	**1= Calculation error 2= Wrong emission factor(s) used 3= Control efficiency(ies) not accepted 4= Other (Specify in Table below)**

EMISSION SOURCE ID NUMBER	CALCULATION METHOD CODE	ACCEPT OR REJECT?	CALCULATION REJECTION CODE	MCAQ CALCULATIONS ATTACHED?
All	1, 2, 3	Accept		No

Actual emissions in Section D are based upon annual emissions submitted by the facility for calendar year 2019 as entered into MCAQ's EPIC database.

SECTION E

SUPPORTING DOCUMENTATION

(Provide brief description of any ATTACHMENTS)

1. Application dated May 18, 2020

MCAQ Application Review Checklist

Item/Step			✓/Date Sent/NA	Date Received	Comment
1	Application Received email sent • also remember to send the following emails: o Start of Public Comment o Permit Issued w/survey		✓/		
2	Additional Info Before 45 Days letter		NA		
3	Additional Info After 45 Days letter		NA		Number of Days Between:
4	Existing Unpermitted Facility 1st Letter w/Invoice		NA		Enter fee payment in EPIC
5	EPIC	Update Facility/Contact Info per A1 Form	Up-to-date		
		Enter Blank Milestones: • Commencement of Operation • Annual Report Received if new facility • Point/Process Info if new point/process	NA		
6	Update Facility Catalogue Info as needed at: G:\AQsource\PLANTS\Facility Catalog .xlsx		Up-to-date		
7	New Facility	Create Share Folder w/subfolders for New Premise Number on LAN	NA		
		Notify IT of New Premise Number	NA		
8	New SM/TV Facility	Notify ICIS Air Data Steward	NA		
9	New 112r Facility	Notify RMP Sr. Specialist if facility is subject to 112r per A1 form	NA		